

1 GIA N. MARINA
Nevada Bar No. 15276
2 **CLARK HILL PLLC**
1700 South Pavilion Center Drive, Suite 500
3 Las Vegas, Nevada 89135
E-mail: gmarina@clarkhill.com
4 Telephone: (702) 862-8300
Facsimile: (702) 778-9709
5 *Attorney for Defendant*
6 *National Consumer Telecom & Utilities*
Exchange, Inc.

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 KERRI THOMPSON,

11 Plaintiff,

12 vs.

13 EQUIFAX INFORMATION SERVICES, LLC,
14 NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC., CLARITY
15 SERVICES, INC., COMENITY BANK.

16 Defendants.
17

Case No. 2:25-cv-00359-CDS-EJY

**JOINT MOTION FOR EXTENSION OF
TIME FOR DEFENDANT NATIONAL
CONSUMER TELECOM & UTILITIES
EXCHANGE, INC. TO FILE ANSWER**

FIRST REQUEST

18 Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has
19 requested an extension of time to answer, move or otherwise respond to the Complaint in this
20 matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY
21 STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or
22 otherwise respond to the Complaint in this action is extended from March 27, 2025 through and
23 including **April 25, 2025**. The request was made by NCTUE so that it can have an opportunity to

24 //

25 //

26

27

28

1 collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff
2 approves. This stipulation is filed in good faith and not intended to cause delay.

3 Respectfully submitted, this 19th day of March, 2025.

4 CLARK HILL PLLC

No opposition

5 By: /s/Gia N. Marina

/s/Gerardo Avalos

6 Gia N, Marina

George Haines, Esq.

1700 South Pavilion Center Drive, Suite 500

Nevada Bar No. 9411

Las Vegas, Nevada 89135

Gerardo Avalos

Telephone: (702) 862-8300

Nevada Bar No. 15171

Facsimile: (702) 778-9709

FREEDOM LAW GROUP

Email: gmarina@clarkhill.com

8985 S. Eastern Ave., Suite 350

Attorney for Defendant National Consumer

Henderson, NV 89123

Telecom & Utilities Exchange, Inc.

Phone: (702) 880-5554

Fax: (702) 385-5518

Email: ghaines@freedomlegalteam.com

Email: gavalos@freedomlegalteam.com

Attorneys for Plaintiff

18 IT IS SO ORDERED:

19 
20 United States Magistrate Judge

21 DATED: March 19, 2025